

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TOMEKA HINTON,)	
)	
Plaintiff,)	
)	Case No.
vs.)	
)	St. Louis County Circuit Court
CENTRAL CREDIT SERVICES, LLC,)	Cause No: 17SL-AC08790
)	
Defendant.)	JURY TRIAL DEMANDED

NOTICE OF REMOVAL

Please take notice that, pursuant to 28 U.S.C. §§ 1331, 1441 and 1446, defendant Central Credit Services, LLC (hereinafter referred to as “CCS”) hereby removes the above-captioned civil action from the 21st Judicial Circuit Court, Associate Division, St. Louis County, State of Missouri (hereinafter referred to as “the State Court”) to the United States District Court for the Eastern District of Missouri. The removal of this civil action is proper because:

1. On or about April 4, 2017, plaintiff Tomeka Hinton, through her attorney, initiated in the State Court a civil action entitled “*Tomeka Hinton, Plaintiff, v. Central Credit Services LLC, Defendant,*” No. 17SL-AC08790 on the docket of the State Court (hereinafter referred to as “the State Court Action”) by filing a “Petition” (hereinafter referred to as “the Petition”).
2. On or about April 13, 2017, the State Court clerk issued an “Associate Division Summons” (hereinafter referred to as “Summons”) directed to CCS.
3. On or about April 18, 2017, CCS, through its agent for service of process, CT Corporation System (hereinafter referred to as “CTCS”), was served with the Summons and a

copy of the Petition, as reflected in the April 18, 2017 CTCS “Service of Process Transmittal” that CTCS sent to CCS by e-mail, together with the Summons and Petition.

4. Plaintiff Tomeka Hinton’s claim against CCS is based upon the U.S. Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter referred to as the “FDCPA”).

5. Pursuant to 28 U.S.C. § 1331, this Court has original jurisdiction over Plaintiff’s claim because Plaintiff’s Petition filed in the State Court Action presents a federal question arising under the FDCPA.

6. Pursuant to 28 U.S.C. § 1441, the State Court Action is removable to this Honorable Court because it is a civil action, brought in state court, that includes a claim arising under the laws of the United States (within the meaning of 28 U.S.C. § 1331).

7. CCS is filing this Notice of Removal timely under 28 U.S.C. § 1446(b) because CCS is filing it within thirty (30) days after CCS’ receipt of the initial pleading setting forth the claim for relief by Plaintiff.

8. A copy of all process, pleadings and orders served upon defendant CCS in the State Court Action is being filed with this Notice and is attached as Exhibit A.

WHEREFORE, Defendant CCS hereby removes the State Court Action to this Honorable Court.

/s/Michael S. Hamlin

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Copy of the foregoing mailed this 16th day of May, 2017 to:

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/s/Michael S. Hamlin